

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

**AMERICAN AIRLINES, INC. and
AADVANTAGE LOYALTY IP LTD.,**

Plaintiffs,

v.

**RED VENTURES, LLC and THE
POINTS GUY, LLC,**

Defendants.

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Civil Action No. 4:22-cv-00044-P

**DEFENDANT RED VENTURES, LLC’S RULE 12(B)(2) MOTION TO DISMISS AND
DEFENDANTS RED VENTURES, LLC’S AND THE POINTS GUY, LLC’S RULE
12(B)(3) MOTION TO DISMISS OR TRANSFER VENUE**

Defendant Red Ventures, LLC (“RV”) files this Motion to Dismiss Plaintiffs American Airlines’ and AAdvantage Loyalty IP Ltd.’s (collectively, “AA”) Complaint pursuant to Rule 12(b)(2). RV and The Points Guy, LLC (“TPG”) (collectively, “Defendants”) additionally file this Motion to Dismiss AA’s Complaint pursuant to Rule 12(b)(3) of the Federal Rules of Civil Procedure and Alternatively to Transfer Venue.

Under Local Rule 7.1, this motion is supported by a brief and appendix setting forth Defendants’ contentions of law, arguments, and authorities, which are filed contemporaneously with this motion. For the reasons set forth in the accompanying brief and appendix, Defendants respectfully requests that the Court (1) grant RV’s Motion to Dismiss, (2) grant Defendants’ Motion to Dismiss or alternatively to Transfer, and (3) grant Defendants such other and further relief, at law and in equity, to which they are justly entitled.

Dated: April 1, 2022

Respectfully submitted,

BECK REDDEN LLP

/s/ Alex B. Roberts

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**ATTORNEYS FOR DEFENDANTS RED
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LLC**

CERTIFICATE OF SERVICE

On April 1, 2022, I electronically submitted the foregoing document with the Clerk of Court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the Court. I hereby certify that I have served all counsel of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Colin P. Benton

Colin P. Benton